

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(10) ADIANGEL PAREDES,

Defendant.

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Criminal No. 19-CR-40049-TSHs

GOVERNMENT'S REQUESTED VOIR DIRE QUESTIONS

The United States of America respectfully requests that, in addition to those questions commonly put to the venire in trials before this Court, the Court pose the following questions to the prospective jurors in this case:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as “the government.” Have you, or any member of your immediate family, or anyone with whom you are close:

- a. ever been a defendant in a criminal proceeding (other than for an alleged moving traffic violation)?
- b. ever filed a lawsuit or claim of any kind against any police or other law enforcement officer?
- c. ever engaged in litigation with the federal government, that is, ever filed a claim or lawsuit against the United States or any of its agencies, or answered some claim made against you by the federal government?
- d. ever been treated unfairly by any police officer or other law enforcement personnel?

2. Are you aware of any beliefs or feelings that you might have against the United States Attorney's Office, the Federal Bureau of Investigation (“FBI”), the Massachusetts

Department of Correction, the Waltham Police Department, the Drug Enforcement Administration (“DEA”), or any other law enforcement organization, or the federal government in general, that would in any way impair your ability to evaluate and judge the facts of this case fairly and impartially?

3. Some of the witnesses expected to be called by the United States at trial are federal agents and law enforcement officers with various state and local police departments, who are also members of an FBI task force. Are you aware of any beliefs or feelings that you might have against a law enforcement officer working for a police department or with a federal law enforcement agency?

4. Would you tend to credit or discredit a law enforcement officer’s testimony merely because that witness is a law enforcement officer?

5. Have you watched television shows and movies about police work, forensic evidence, or the criminal justice system? If you have, do you believe your views developed as a result of those shows will interfere with your ability to base your verdict solely on the evidence in this case?

6. The indictment in this case charges the defendant with conspiracy to distribute fentanyl, heroin, and cocaine. Have you, or any member of your immediate family, or anyone with whom you are close:

- a. ever been, or known anyone who has been, adversely affected by the actions of someone in possession of drugs?
- b. ever been arrested or charged with drug possession or distribution?
- c. been a member of any group that advocates legislation or policy relating to drugs?

d. ever used any drugs, been addicted to drugs, or been placed in a drug treatment program?

7. Do you have any pre-conceived notions about drug laws, particularly involving heroin or fentanyl, that would make you unable to decide this case on the evidence presented and the law as stated by the Court?

8. Do you have any general or specific opinions about heroin or fentanyl that would prevent you from serving as a fair and impartial juror in this case?

9. There may be a witness in this case who speaks Spanish and requires an interpreter. Would that affect your ability to listen to his testimony and evaluate it fairly?

10. Do you know of any reason why you cannot sit as a fair and impartial juror in the trial of this case?

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Alatheia E. Porter
Alatheia E. Porter
Sarah B. Hoefle
Assistant United States Attorneys

Date: September 30, 2022

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Alatheia E. Porter
Alatheia E. Porter
Assistant United States Attorney

Date: September 30, 2022